

Exhibit F

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

THE STATE OF LOUISIANA,
By and through its Attorney General, JEFF
LANDRY,

THE STATE OF MONTANA,
By and through its Attorney General, AUSTIN
KNUDSEN,

THE STATE OF ARIZONA,
By and through its Attorney General, Mark
Brnovich, et al.,

CIVIL ACTION NO. _____

PLAINTIFFS,

v.

XAVIER BECERRA, in his official capacity as
Secretary of Health and Human Services; et al.,

DEFENDANTS.

DECLARATION OF SHELBY N. HILL

My name is Shelby N. Hill. I am over the age of 18 and am competent to make this declaration. The facts set forth in this declaration are based on my personal knowledge.

1. I am the Director of Radiology at Drumright Regional Hospital in Drumright, Oklahoma, which employs 110 employees. Our hospital is a Critical Access Hospital providing care to Drumright and the surrounding communities. I work closely with administration and providers to provide imaging services to our patients. My role as Director of Radiology is a hybrid role as I also work in the clinical setting providing care to patients as well as an administrative role. I have been living at my workplace since the end of September to help alleviate the issue of staff shortage because it is difficult to get employees to work in rural hospital settings.
2. Drumright Regional Hospital provides a number of services to the community including but not limited to emergency care, physical therapy, speech therapy, occupational therapy, inpatient services, outpatient services, extended stay services (swing bed), laboratory, radiology, surgery, OB/GYN, Orthopedics, and senior life therapy. Our hospital provides a number of radiology services including: Computed Tomography, Magnetic Resonance Imaging, Ultrasound, X-ray, Bone Density, and Intraoperative fluoroscopy. We also offer an array of surgical procedures to the community including general, orthopedic, dental, and gynecologic surgery.
3. Our hospital provides care to Medicare and Medicaid patients in the area resulting in approximately 75 percent of our total patients. Because we receive Medicare and Medicaid funding, our hospital is subject to the CMS vaccine mandate requiring all healthcare workers to be vaccinated with no option of weekly testing. We are already facing severe labor shortages and struggling to find enough employees to staff the hospital appropriately that this mandate causes extreme hardship on our hospital.
4. Based on my own personal knowledge, I estimate that approximately 43-45% of our employees are not vaccinated with the coronavirus vaccine. Of those employees, I estimate at least 40% to either not be willing or able to take the vaccine against coronavirus as mandated by CMS.
5. This new mandate for healthcare workers providing care to Medicare and Medicaid patients will greatly impact our rural hospital. If we lose 43-45% of our workforce we will be unable to provide safe and efficient care for our patients in the community. As a critical access hospital, we are able to have 15 inpatient beds but with close to half of our staff losing their jobs because of this mandate we will not be able to provide care and services

to that many patients in the hospital. We are facing losing 67% of our radiology staff, 25% of surgical staff, 81% of nursing staff, and 50% of physical therapy staff. Because of this large number facing the loss of their jobs, I fear that our rural hospital will soon face closing the doors permanently.

6. I declare under the penalty of perjury that the forgoing is true and correct.

Executed on November 11, 2021

A handwritten signature in black ink, appearing to read "Shelby N. Hill", is written over a horizontal line.

Shelby N. Hill MSRS RT(R)(CT), Director of Radiology
Drumright Regional Hospital